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Attorneys for Defendant
 INTEL CORPORATION

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

VLSI TECHNOLOGY, LLC,

 Plaintiff,

 v.
 INTEL CORPORATION,

 Defendant.

Case No. 5:17-cv-05671-BLF-NC

**DEFENDANT INTEL CORPORATION'S
 NOTICE OF MOTION AND OMNIBUS
 MOTION FOR SUMMARY JUDGMENT**

Date: October 19, 2023
 Time: 9:00 a.m.
 Courtroom: 3 (5th Floor)
 Judge: Honorable Beth L. Freeman

NOTICE OF MOTION AND MOTION:

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 19, 2023 at 9:00 a.m., or as soon thereafter as the matter can be heard in the courtroom of the Honorable Beth Labson Freeman, located at 280 South First Street, Courtroom 3, 5th Floor, San Jose, CA 95113, Defendant Intel Corporation (“Intel” or “Defendant”) will, and hereby does, move the Court for summary judgment (1) of no infringement for the four asserted patents, U.S. Patent Nos. 8,566,836 (“’836 patent”), 8,004,922 (“’922 patent”), 7,675,806 (“’806 patent”), and 8,268,672 (“’672 patent”), (2) of invalidity of the asserted claims for the ’922 patent, (3) that it is licensed to all asserted patents, and (4) of no willful infringement, no indirect infringement, and no enhanced damages for any patent.

This Motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities in support thereof, the Declaration of Mark Selwyn and exhibits in support thereof, the pleadings and papers on file in this action, any other such matters upon which the Court may take judicial notice or which are incorporated by reference, the arguments of counsel, and any other matters that the Court may properly consider.

Respectuflly submitted,

Dated: August 24, 2023

/s/ Mark D. Selwyn

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